

Fill in this information to identify the case:

Debtor 1 Bobbi J. Maffeo
Debtor 2 Cynthia L. Maffeo, fka Cynthia L. Kirby
(Spouse, if filing)
United States Bankruptcy Court for the: Western District of Pennsylvania
(State)
Case number 15-70724 JAD

Form 4100R

Response to Notice of Final Cure Payment

10/15

According to Bankruptcy Rule 3002.1(g) the creditor responds to the trustee's notice of final cure payment.

Part 1: Mortgage Information

Name of Creditor: WELLS FARGO BANK, N.A. **Court claim no. (if known):** 41
Last 4 digits of any number you use to identify the debtor's account: 5932
Property address: 769 Railroad Street
Number Street
Windber, PA 15963
City State ZIP Code

Part 2: Prepetition Default Payments

Check one:

- ☒ Creditor agrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim.
- ☐ Creditor disagrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim. Creditor asserts that the total prepetition amount remaining unpaid as of the date of this response is: \$ _____

Part 3: Postpetition Mortgage Payment

Check one:

- ☒ Creditor states that the debtor(s) are current with all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

The next postpetition payment from the debtor(s) is due on: 01/01/2021
MM/DD/YYYY

- ☐ Creditor states that the debtor(s) are not current on all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

Creditor asserts that the total amount remaining unpaid as of the date of the response is:

- a. Total postpetition ongoing payments due: (a) \$ _____
b. Total fees, charges, expenses, escrow, and costs outstanding: +(b) \$ _____
c. **Total.** Add lines a and b. (c) \$ _____

Creditor asserts that the debtor(s) are contractually obligated for the postpetition payment(s) that first became due on: _____
MM/DD/YYYY

If the creditor disagrees in Part 2 that the prepetition arrearage has been paid in full or states in Part 3 that the debtor(s) are not current with all postpetition payments, including all fees, charges, expenses, escrow, and costs, the creditor must attach an itemized payment history disclosing the following amounts for the date of the bankruptcy filing through the date of this response:


- all payments received;
- all fees, costs, escrow, and expenses assessed to the mortgage; and
- all amount the creditor contends remain unpaid.

The person completing this response must sign it. The response must be filed as a supplement to the creditor's proof of claim.

☐ I am the creditor.

☒ I am the creditor's authorized agent.

Sign and print your name and your title, if any, and state your address and telephone number if different from the notice address listed on the proof of claim to which this response applies.

| | | |
|---|------------------|------------|
|  | Date | 01/14/2021 |
| Signature | | |
| Jill Manuel-Coughlin, Esq. / Harry B. Reese, Esq. / Sarah K. McCaffery, Esq. | Title | Attorney |
| First Name | Middle Name | Last Name |
| Company | Powers Kirn, LLC | |

If different from the notice of address listed on the proof of claim to which this response applies:

| | | | |
|---------|----------------------------------|--------|----------|
| Address | 8 Neshaminy Interplex, Suite 215 | | |
| | Number | Street | |
| | Trevose, PA 19053 | | |
| | City | State | ZIP Code |

Contact phone 215-942-2090 Email bankruptcy@powerskirn.com

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

| | | |
|--|------------|---------------------------------------|
| IN RE: Bobbi J. Maffeo Cynthia L. Maffeo, fka Cynthia L. Kirby | Debtor(s) | Case No.: 15-70724 JAD Chapter: 13 |
| WELLS FARGO BANK, N.A. | Movant | |
| v. Bobbi J. Maffeo Cynthia L. Maffeo, fka Cynthia L. Kirby | Respondent | |

**CERTIFICATION OF SERVICE
OF RESPONSE TO NOTICE OF FINAL CURE PAYMENT**

I hereby certify under penalty of perjury that I served the above captioned parties at the address specified below or on the attached list on January 14, 2021.

The type of service made on the parties (first-class mail, electronic notification, hand delivery or another type of service) was service by electronic notification and first-class U.S. Mail.

Parties served via electronic notification:

Ronda J. Winnecour
Suite 3250, USX Tower
600 Grant Street
Pittsburgh, PA 15219
cmecf@chapter13trusteedpa.com
Trustee

Kenneth P. Seitz, Esquire
Law Offices of Kenny P. Seitz
P.O. Box 211
Ligonier, PA 15658
thedebraters@aol.com
Attorney for Debtor/Debtors

Parties served via First-Class Mail

Bobbi J. Maffeo
769 Railroad Street
Windber PA 15963
Debtor

Cynthia L. Maffeo, fka Cynthia L. Kirby
769 Railroad Street
Windber, PA 15963
Debtor

Dated: January 14, 2021

/s/ Sarah K. McCaffery
POWERS KIRN, LLC
Jill Manuel-Coughlin, Esq.; Atty ID #63252
Harry B. Reese, Esq.; Atty ID #310501
Sarah K. McCaffery, Esq.; Atty ID #311728
8 Neshaminy Interplex, Suite 215
Trevose, PA 19053
Phone: 215-942-2090; Fax 215-942-8661
Email: bankruptcy@powerskirk.com
Attorneys for Creditor/Movant